

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION
Civil Action No.**

Hickory Tavern Church of God,

Plaintiff,

v.

Church Mutual Insurance Company,

Defendant.

NOTICE OF REMOVAL

The Defendant Church Mutual Insurance Company would respectfully show in support of its Notice of Removal that:

1. This action was filed on or about February 4, 2019, in the Laurens County Court of Common Pleas, South Carolina. A copy of Plaintiff's Complaint is attached hereto as Exhibit A. The Summons and Complaint were served no earlier than February 26, 2019. This Notice of Removal is being filed within thirty (30) days of the service of the Complaint.

2. This removal notice is based on this Court's diversity jurisdiction pursuant to 28 U.S.C. § 1332 (a) (1) and 28 U.S.C. § 1441 and 28 U.S.C. § 1446.

3. There is complete diversity of citizenship between the Plaintiff and the Defendant. The Plaintiff alleges in its Complaint that it is a church organization existing under the laws of South Carolina with its facilities located in Laurens County, South Carolina. (Complaint, Paragraphs 1 and 2).

4. The Defendant is a corporation organized and established under the laws of the State of Wisconsin and has its principal place of doing business in the State of Wisconsin.

5. This action involves an insurance coverage dispute in which the Plaintiff asserts that its property damage covered by the insurance policy issued by the Defendant exceeds \$1.4 million. (Complaint, Paragraph 11).

6. The amount in controversy exceeds Seventy-five Thousand and No/100 (\$75,000.00) Dollars, exclusive of interest and costs.

7. The Defendant will promptly furnish to the Clerk of Court for Laurens County a copy of this Notice of Removal. A copy of the Clerk's Acknowledgement of filing of Notice of Removal will be filed promptly with this Court after it is received from the Laurens County Clerk of Court. No other papers have been filed by the Defendant in the State Court action.

8. Other than the Summons and Complaint, no other documents have been filed with the State Court in this action.

9. The Defendant will file its responsive pleading to the Complaint within the time allowed under Federal Rule of Civil Procedure 81 (c) (2).

WHEREFORE, Defendant Church Mutual Insurance Company respectfully removes this action from the Laurens County Court of Common Pleas to this Court.

MURPHY & GRANTLAND, P.A.

s/Jeffrey C. Kull

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